

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION,

M.D.L. No. 1775

06-MD-1775 (JG) (VVP)

ALL CASES

**SUGGESTION OF BANKRUPTCY
FOR JAPAN AIRLINES CORPORATION, ET AL.**

STEPTOE & JOHNSON, LLP

William Karas
Kenneth P. Ewing
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 429-6223
Facsimile: (202) 429-3902

*Counsel for Japan Airlines International
Co., Ltd.*

PLEASE TAKE NOTICE that, on January 19, 2010 (the “Petition Date”), Japan Airlines Corporation, Japan Airlines International Co., Ltd. and JAL Capital Co., Ltd. (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) seeking recognition and effect of the Debtors’ reorganization proceedings commenced under the Corporate Reorganization Act of Japan in Tokyo District Court (the “Japan Proceeding”). Upon commencement of the Japan Proceeding, the Tokyo District Court appointed Eiji Katayama as the “foreign representative” of the Debtors as defined in section 101(24) of the Bankruptcy Code (the “Foreign Representative”).

PLEASE TAKE FURTHER NOTICE that the Debtors’ chapter 15 cases (collectively, the “Chapter 15 Cases”) are pending before the Honorable James M. Peck, Bankruptcy Judge and are being jointly administered under the lead case of Japan Airlines Corporation, *et. al.*, Case No. 10-10198 (JMP). A copy of the voluntary petitions of Debtors Japan Airlines Corporation, Japan Airlines International Co., Ltd. and JAL Capital Co., Ltd. are attached hereto as Exhibits A, B and C, respectively. As indicated by the Bankruptcy Court’s *Order to Show Cause with Temporary Restraining Order* [Docket No. 25], attached hereto as Exhibit D and incorporated herein by reference (the “Relief Order”), the Debtors were granted certain relief from the Bankruptcy Court pursuant to section 1519 of the Bankruptcy Code.¹

¹ Contemporaneously with the Relief Order, the Debtors are seeking that an *Order Granting Preliminary Injunction* (the “Preliminary Injunction”), be entered within no later than 10 days after the Petition Date. This order may be entered by the Bankruptcy Court without further notice or hearing if no unresolved objections to the Relief Order exist. The Preliminary Injunction will be superseded by an order formally recognizing the Japan Proceeding (the “Recognition Order”) upon its entry. The Recognition Order would stay

PLEASE TAKE FURTHER NOTICE that pursuant to the Relief Order, the automatic stay provisions of 11 U.S.C. § 362 are provisionally applied to stay the commencement or continuation of any action or proceeding concerning the Debtors or their assets within the United States, or their related rights, obligations or liabilities.

Dated: January 21, 2010

/s/ Kenneth P. Ewing

William Karas
Kenneth P. Ewing
STEPTOE & JOHNSON, LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 429-3000 (telephone)
(202) 429-3902 (facsimile)

Counsel for Japan Airlines International Co., Ltd.

these proceedings for the duration of the Japan Proceeding. The Debtors are seeking a hearing to approve the Recognition Order 24 days after the Petition Date. The Debtors will send notice of the Recognition Order upon its entry.

CERTIFICATE OF SERVICE

I, Kenneth Ewing, hereby certify that on January 21, 2010, a true and correct copy of Suggestion of Bankruptcy for Japan Airlines Corporation, et. al., was served via the Court's Electronic Case Filing (ECF) system on all counsel registered for ECF in this case.

Dated: January 21, 2010

/s/ Kenneth P. Ewing
KENNETH P. EWING